

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

CLAUDIA HARRIS,)
)
Plaintiff,)
)
v.)
)
EXPERIAN INFORMATION) Index No.: 1:24 Civ.7696
SOLUTIONS, INC.; EQUIFAX)
INFORMATION SERVICES, LLC.)
)
Defendants.)
)
)

**DEFENDANT EXPERIAN INFORMATION SOLUTIONS, INC.'S
NOTICE OF REMOVAL**

Pursuant to 28 U.S.C. §§ 1331, 1367, 1441, and 1446, Defendant Experian Information Solutions, Inc. (“Experian”) hereby files this Notice of Removal of the above-captioned action to this Court on the following grounds:

1. Experian is a named Defendant in Index No. CV-022221-24/QU filed by Plaintiff Claudia Harris (“Plaintiff”) in the Civil Court of the City of New York, County of Queens (the “State Court Action”).
2. The Complaint in the State Court Action was filed with the Clerk of the Civil Court of the City of New York, County of Queens on September 19, 2024.
3. This Notice is being filed with this Court within thirty (30) days after Experian received a copy of Plaintiff’s initial pleading on October 15, 2024 setting forth the claims for relief upon which Plaintiff’s action is based.
4. This Court is the proper district court for removal because the State Court Action is pending within this district.

5. Pursuant to 28 U.S.C. § 1446(a), a copy of all process, pleadings, and orders served upon Experian in the State Court Action is attached hereto as **Exhibit A**.

6. Experian is a corporation which, for monetary fees, regularly engages in whole or in part in the practice of assembling consumer credit information or other information on consumers for the purpose of furnishing consumer reports to third parties. Experian uses means or facilities of interstate commerce for the purpose of preparing or furnishing consumer reports, and therefore is a “consumer reporting agency” within the meaning of 15 U.S.C. § 1681a(f).

7. Equifax Information Services, LLC (“Equifax”) is a corporation which, for monetary fees, regularly engages in whole or in part in the practice of assembling credit information or other information on consumers for the purpose of furnishing consumer reports to third parties. Equifax uses means or facilities of interstate commerce for the purpose of preparing or furnishing consumer reports, and therefore is a “consumer reporting agency” within the meaning of 15 U.S.C. § 1681a(f).

8. The claims for relief against Defendants alleged in the State Court Action arise under the Fair Credit Reporting Act, 15 U.S.C. § 1681 *et seq* (“FCRA”). Thus, this Court has original subject matter jurisdiction over the above-captioned action pursuant to 28 U.S.C. § 1331, 15 U.S.C. § 1681p. The above-captioned action may properly be removed to this United States District Court pursuant to 28 U.S.C. § 1441(a).

9. Pursuant to 28 U.S.C. § 1337(a), this Court has supplemental jurisdiction over Plaintiff’s other claims for relief, as these claims arise from the same operative facts and form part of the same case or controversy as Plaintiff’s federal FCRA claims.

10. As of the date of this Notice, Equifax has not been served.

11. Promptly after the filing of this Notice of Removal, Experian shall provide notice of the removal to Plaintiff, and shall file a copy of this Notice with the clerk of the court in the State Court Action, as required by 28 U.S.C. § 1446(d).

Dated: November 4, 2024

Respectfully submitted,

/s/ Lauren H. Kim

Lauren H. Kim
JONES DAY
250 Vesey Street
New York, New York 10281
Telephone: (212) 326-3434
Email: lkim@jonesday.com

*Attorney for Defendant
Experian Information Solutions, Inc.*